



Christine Jines
Corporate Manager-
Federal Regulatory
DOCKET FILE COPY ORIGINAL

EX PARTE OR LATE FILED

SBC Communications Inc.
1401 I Street, N.W.
Suite 1100
Washington, D.C. 20005
Phone 202 328-8879
Fax 202 408-4806

RECEIVED

OCT - 1 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

October 1, 1997

EX PARTE

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW
Room 222
Washington, DC 20554

Re: CC Docket No 96-128 - In the Matter of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996

Dear Mr. Caton:

Today, SBC sent the attached letter to John Muleta, Acting Deputy Chief of the Common Carrier Bureau. Please enter into the above mentioned docket file.

In accordance with 47 C.F.R. § 1.1206(a)(1) of the Commission's rules, the original of this letter and one copy are being filed with your office. Acknowledgment and date of receipt are requested. A duplicate of this letter is included for this purpose.

Sincerely,

Chris Jines
Attachment

No. of Copies rec'd 01
List ABOVE

SBC Communications Inc.
1401 I Street, N.W.
Suite 1100
Washington, DC 20005



RECEIVED

OCT - 1 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

October 1, 1997

By Hand

John B. Muleta, Esquire
Acting Deputy Chief
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W., Room 500
Washington, D.C. 20554

Dear Mr. Muleta:

Re: *Pay Telephone Reclassification and Compensation Provisions of the
Telecommunications Act of 1996, CC Docket No. 96-128*

This letter is a follow up to Michael Kellogg's letter to you dated September 30, 1997. Attached are the time schedules of anticipated completion dates for implementation of Flex ANI by Southwestern Bell Telephone Company ("SWBT"), Pacific Bell, and Nevada Bell.

Please call me on 415-542-7661 if you wish to discuss our schedules.

Sincerely,

A handwritten signature in cursive script that reads "Jeffrey B. Thomas".

Jeffrey B. Thomas

Southwestern Bell Telephone Company

Southwestern Bell Telephone Company ("SWBT") will have to license and install Flex ANI software in 161 of its 556 switches and perform switch translations and testing in all its switch types. A tariff filing will be required in order to charge payphone service providers for this service. This tariff filing can take place by the date at which switch translations are completed. SWBT's anticipated schedule for implementation of Flex ANI is as follows:

End of Period	Accumulated Percentage of Total Lines*
12/31/97	30
1/30/98	50
2/28/98	70
3/31/98	90
4/15/98	100*

*SWBT has 63 DMS-10 switches which are scheduled to be replaced with DMS-100/5ESS remotes by the second quarter of 1998. SWBT will license Flex ANI software for the DMS-100/5ESS remotes rather than the DMS-10 switches. In addition, at most 28 of SWBT's 556 switches (i.e., at most 28 combined DMS 200 and DMS100/200 TOPS switches) cannot pass the original Flex ANI digits intact to a carrier on "0-transfer" and misrouted calls because of Flex ANI software limitations. Potential solutions are being explored. ANI digits also will not be able to be passed on FGB service on 950 calls or on 800 routing to POTS #s because of technological limitations. SWBT believes that these calls represent a very small percent (similar to Pacific Bell's percent, i.e., less than 1 ½%) of the dial around access code and subscriber 800 payphone calls on SWBT's network. Compensation for these calls can continue to be accommodated via ANI lists. Moreover, 950 calling on FGD from 5ESS offices will not support Flex ANI as of January 1, 1998 when we must move to mandatory 4-digit CICs. A vendor solution is required. Again, these calls represent a very small percentage of the relevant calls.

Pacific Bell

Pacific Bell will have to license and install Flex ANI software in 199 of its 452 switches and perform switch translations and testing in all its switch types. A tariff filing will be required in order to charge payphone service providers for this service. This tariff filing can take place by the date at which switch translations are completed. Pacific Bell's anticipated schedule for implementation of Flex ANI is as follows:

End of Period	Accumulated Percentage of Total Lines*
12/31/97	30
1/30/98	50
2/28/98	70
3/31/98	90
4/15/98	100*

*ANI digits will not be able to be passed on FGB service on 950 calls or on 800 routing to POTS #s because of technological limitations. These calls are estimated to represent less than 1 ½% of the dial around access code and subscriber 800 payphone calls on Pacific Bell's network, and compensation on these calls can continue to be accommodated via ANI lists. In addition, 950 calling on FGD from 5ESS offices will not support Flex ANI as of January 1, 1998 when we must move to mandatory 4-digit CICs. A vendor solution is required. Again, these calls represent a very small percentage of the relevant calls. Moreover, Pacific Bell's 18 DMS-200 TOPS switches cannot pass the original Flex ANI digits intact to a carrier on "0- transfer" and misrouted calls because of Flex ANI software limitations. Potential solutions are being explored.

Nevada Bell

Nevada Bell has Flex ANI software installed in all its switches but must perform translations in all switch types before being able to deliver Flex ANI. A tariff filing will be required in order to charge this service to payphone service providers. This tariff filing can take place by the date at which switch translations are completed. Nevada Bell's anticipated schedule for implementation of Flex ANI is as follows:

End of Period	Accumulated Percentage of Total Lines*
12/31/97	100*

*ANI digits will not be able to be passed on FGB service on 950 calls or on 800 routing to POTS #s because of technological limitations. These calls are estimated to represent less than ½ % of the dial around access code and subscriber 800 payphone calls on Nevada Bell's network, and compensation for these calls can continue to be accommodated via ANI lists. A vendor solution is required. Moreover, Nevada Bell's one DMS-100/200 TOPS switch cannot pass the original Flex ANI digits intact to a carrier on "O-transfer" and misrouted calls because of Flex ANI software limitations. Potential solutions are being explored.